



August 15, 2016

Chris Kimball
Pac Met, Inc.
2519 N. Front St.
Woodburn, OR 97071

Cliff Boyd
CALBAG Resources, LLC
1700 Topaz Dr.
Missoula, MT 59808

Re: Closure of Complaint [CVID #18794]

Dear Messers Kimball and Boyd:

The Montana Department of Environmental Quality's (DEQ) Enforcement Division (ENFD) received a complaint regarding dust generated from the dumping of anode carbon from the Columbia Falls Aluminum Company facility (CFAC) onto private property at 2817 Highway 2 W, Kalispell, Montana (Property). The complaint alleges that dust from the anode carbon is contaminating the adjacent properties.

On October 6, 2015, I discussed the complaint with Cliff Boyd and he indicated that Calbag discontinued hauling anode carbon from the CFAC facility effective 2:45 pm, October 6, 2015. Cliff indicated that Calbag had intended to temporarily store the material on the Property until it could be hauled to the PACMET facility in Oregon for recycling.

On October 15, 2015, Margarite Thomas (ENFD) completed a Field Investigation of the Property, validated the complaint and confirmed hauling operations have stopped and that a water truck was on site.

On October 26, 2015, ENFD sent a Violation Letter to CALBAG Resources and CFAC which addressed this complaint. The Violation Letter recommended submittal of a plan for the testing, removal and proper disposal of any soil on the Property that has concentrations of hazardous constituents above naturally-occurring background concentrations. As part of the clean-up plan for the Property, DEQ required you to submit a hazardous waste determination for the anode carbon based upon TCLP samples for RCRA 8 metal, cyanide and fluoride for the anode carbon stored on the Property.

On November 25, 2015, Feige & Associates submitted and DEQ approved the Site Cleanup Verification Work Plan for the Property. On August 12, 2016, ENFD received the Final Site Cleanup Report from Feige & Associates, Inc.

ENFD has reviewed the Final Site Cleanup and Sampling Report. Based on review of the information provided in the Report, ENFD is closing this complaint.

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Thank you for your cooperation in this matter. If you have any questions, concerns, or believe any of the above stated facts are inaccurate, please contact me at the phone number or email address listed below.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Rieger".

Michael Rieger
Environmental Enforcement Specialist
Enforcement Division
(406) 444-3937
email: mrieger@mt.gov
1520 E. 6th Ave., Helena, MT 59601

cc via email: Flathead Co. R.S.
Rick Thompson/Mary Hendrickson, DEQ WUTMB SW
Mark Hall/Cory Mikita, DEQ HW
Steve Wright, CFAC
Jim Perris, Calbag
John Wyatt, Feige & Associates, Inc.

cc Mark Russell, 1155 Three Mile Dr. Kalispell, MT 59901